

**ATTACHMENT A-STATEMENT OF FACTS**

*The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.*

At all times relevant to this case, defendant **JOHN RALEY** was a resident of Rockville, Maryland.

**RALEY** was a member of approximately 25 groups on a social networking site that trafficked images of clothed minor children, nude minor children and minor children engaged in sexually explicit conduct. **RALEY** distributed approximately 304 unique images, 187 of which are child pornography, to 23 groups during the course of a federal investigation targeting traffickers of child pornography. **RALEY** distributed the following images, among others, to the following sites:

Group title	Number of images RALEY distributed	Number of images that are child pornography	Example
able	22	15	20091225203416: A pre-pubescent male lying naked with an erect penis: the pubescent male is holding it.
Biboy	11	7	20091220074334: A pre-pubescent male lying nude with his penis near the face of a nude pubescent male he is lying on top of.
bt06	15	9	20091213093426: A pre-pubescent male naked with his legs spread displaying his genitals. He is hiding his face from the camera.
Bwild	15	10	20091215230716: A naked pubescent male with the camera focused on his erect penis.

\_\_\_\_ FILED      \_\_\_\_\_ ENTERED  
 \_\_\_\_\_ LOGGED      \_\_\_\_\_ RECEIVED

DEC 19 2011

AT GREENBELT  
 CLERK, U.S. DISTRICT COURT  
 DISTRICT OF MARYLAND

BY

DEPUTY

Group title	Number of images RALEY distributed	Number of images that are child pornography	Example
Justfrands	24	23	20091213095925: A pre-pubescent male displaying an erect penis towards the camera.
justlads	7	6	20091222192149: A pubescent female naked below the waist with her legs spread displaying her genitalia.
lil6	19	9	20091215163343: A pre-pubescent naked male facing the camera and leaning back while his erect penis is aimed at the camera.
lil7	18	13	20091225020538: A naked pre-pubescent male with his face covered by a blanket and the camera focused on his genitals.
mystuff2	3	3	20090827154901: A naked pre-pubescent female sitting with her legs spread and the focus on her genitalia.
nanoboys	6	4	20090827162924: A pre-pubescent male holding erect penis.
naturism	17	3	20100108125107: A pre-pubescent naked male sitting with his legs spread displaying his genitals to camera.
oakhillschool	11	11	2009082716334: An adult male anally penetrating a pre-pubescent male.
rhinotaur	10	10	20091213102615: A pre-pubescent male performing oral sex on an adult male.

Group title	Number of images <b>RALEY</b> distributed	Number of images that are child pornography	Example
sockguys	24	8	20090827160417: A pre-pubescent naked male on a bed holding his legs open to display genitals.
teen	5	2	20091213145911: A pubescent male with an erect penis and camera focused on genitals.
tur_grou-ps	4	4	20091215175951: A pre-pubescent male holding an erect penis towards camera.
turkeyboys	8	4	2009120004443: A naked pre-pubescent male sitting with his legs apart with the focus on his genitals.
wowibois	4	3	20091213145308: A naked pubescent male lying down with the focus on his genitals.
xboxchubs	3	3	20091213094536: A pre-pubescent male is lying on top of a naked adult male being anally penetrated.

**RALEY** distributed images of child pornography to these groups on multiple occasions to include August 26, 2009, August 27, 2009, and December 13, 2009 using the screenname "vladtheimp666." **RALEY** was distributing images from both his home and place of employment. On January 13, 2011, a federal search warrant was executed at his residence and his former place of employment. **RALEY** confessed to possessing child pornography and identified the computers and hard drive where it would be located.

During the search, **RALEY**'s computers and other digital media items were seized and forensically examined. The computers and hard drives utilized by **RALEY** contained over 200,000 images and approximately 4,082 videos depicting children engaged in sexually explicit conduct with approximately 341 depicting sadistic/masochistic depictions of children. These images were in folders with titles such as "Yungboys" and "New boys." There were approximately 7,226 images with hash values matching that of known, identified images. Images present on **RALEY**'s seized digital media on January 13, 2011 included:

- \* **Babyj-captive.avi**, which depicts a toddler female lying on her back with her legs spread and tied to bed posts with white belts. An adult male engages in anal and then vaginal sex with the toddler. The second portion of the video depicts the same toddler female with her legs spread and wearing thigh high stockings while being vaginally penetrated and then ejaculated on by an adult male.
- \* **Mikael bound forced to eat cum.mpeg**, which depicts a pre-pubescent male lying on his back with his hands tied behind him with a rope. An adult male is forcing him to perform oral sex. The adult male ejaculates onto his face and in his mouth.
- \* **Hussyfan Bondage 11yo.mpg**, which depicts a pre-pubescent female removing her clothes and then bound with a rope around her neck and across her chest. Her wrists are tied to rafters in a ceiling that she is hanging from. An adult male stands behind her and pinches her nipples and then masturbates her. The video then cuts to the same pre-pubescent naked female tied to a weight bench with a rope binding her thighs, stomach and arms. The same adult male pinches her nipples and then masturbates her. The male then straddles her face and forces her to perform oral sex. This video is from a known, identified series titled the "Val" series by the National Center for Missing and Exploited Children.

The images and videos depict real children engaged in sexually explicit conduct. The images downloaded onto the defendant's computer were transported through the Internet and therefore traveled in interstate commerce.

\* \* \*

I have read this statement of facts, and carefully reviewed it with my attorney. I acknowledge that it is true and correct.

12/19/11  
Date

  
\_\_\_\_\_  
John Raley